

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND,  
STEVE HARTLEY, RICHARD SCHWETZ,  
JOBEL BARBOSA, MATTHEW REIDINGER,  
JOHN HUGO, SEAN-MICHAEL DAVID  
SCOTT, THOMAS LOUDEN, ZACHARY REHL,  
AMANDA REHL, K.R., a minor, by and through  
her father ZACHARY REHL, and her mother  
AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON,  
ST. LAWRENCE UNIVERSITY, TRIBUNE  
PUBLISHING COMPANY, NEW YORK DAILY  
NEWS, VIJAYA GADDE, TWITTER, INC.,  
COHEN, WEISS AND SIMON, LLP, UNNAMED  
ASSOCIATES 1-100,

Defendants.

CIVIL ACTION NO.:  
2:20-cv-12880-  
JMV-JAD

Hon. John M. Vazquez,  
U.S.D.J.

Oral Argument Requested

Motion Date:  
February 7, 2022

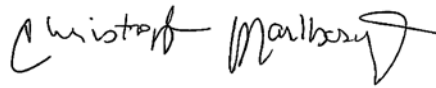
**PLEASE TAKE NOTICE** that the Marlborough Law Firm, P.C., and Richard Torres, Esq. counsel for Defendant Christian Exoo (“Defendant”), shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on February 7, 2022, at 9:00 a.m. or as soon thereafter as counsel may be heard, for the entry of an Order striking COUNT VII of Plaintiffs’ Second Amended Complaint (ECF No. 103) and striking Nick Strickland and Torch Antifa Network as defendants from the Second Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Defendants shall rely upon the Memorandum of Law submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: January 14, 2022

By:



**THE MARLBOROUGH LAW FIRM, P.C.**

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*Counsel for Defendant Christian Exoo*